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Executive Director
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Southern District of New York
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February 12, 2020

By ECF/Hand

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Anthony Rose*, 19 Cr. 789 (PGG)

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: Feb. 19, 2020

Dear Judge Gardephe:

With the consent of the Government and Pretrial Services Officer John Moscato, I write to request three modifications to the terms and conditions of Anthony Rose's bail. Specifically, I request that the Court: (1) allow Mr. Rose to have contact with his son, Anthony Rose, Jr., unrelated to this case and without counsel present; (2) strike Mr. Rose's bail condition of home detention with electronic monitoring; and (3) temporarily modify Mr. Rose's travel restrictions to allow for two weekend-long business trips to North Carolina and South Carolina.

First, I request that Mr. Rose be permitted to have contact with his son, Anthony Rose, Jr., unrelated to this case and outside the presence of counsel. Anthony Rose, Jr.'s attorney Meredith Heller joins in this request. The Government consents to this modification, as do John Moscato and Shawn Bostick, the Pretrial Officers who supervise Anthony Rose and Anthony Rose, Jr.

Second, I request that the Court strike the requirement of home detention with electronic monitoring. Mr. Rose was initially released on December 3, 2019 to home incarceration with electronic monitoring. On December 10, 2019, with the consent of the Government and Pretrial, the Court granted Mr. Rose's request to have his level of supervision reduced from home incarceration to home detention so that he could work outside the home. Mr. Rose now seeks to be excused from home detention and electronic monitoring so that he may ask the Court for temporary business-related travel allowances. Pretrial generally does not consent to overnight travel for defendants on home detention, but Mr. Rose's Pretrial Officer, John Moscato, has no

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objection to removing Mr. Rose from home detention altogether. Mr. Moscato reports that Mr. Rose has been compliant on supervision, is working, and presents no issues. The Government consents to this request as well.

Finally, in the event that Mr. Rose is removed from home detention, he requests two temporary modifications to his travel restrictions to attend weekend-long trainings hosted by Ethnicity Hair Collection (EHC), a company with which he has worked for several years. Each spring, EHC hosts a series of two-day training classes in the Southeast. This year's first training takes place from February 22-24 in Charlotte, North Carolina. The second takes place from March 7-9 in Greenville, South Carolina. I have provided Pretrial Officer John Moscato with Mr. Rose's prospective travel plans. Neither he nor the Government objects to this request.

Thank you for your consideration of these three modifications.

Respectfully submitted,

/s/ Ariel Werner

Ariel Werner

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cc: Mathew Andrews, Esq.
Louis Pellegrino, Esq.
Meredith Heller, Esq.
Pretrial Officer John Moscato
Pretrial Officer Shawn Bostick